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July 16, 2001

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243

VIA HAND DELIVERY

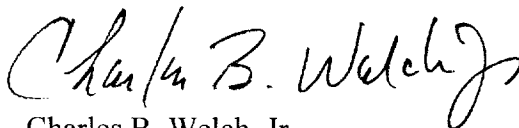
Re: *Docket to Establish Generic Performance Measures, Benchmarks and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*
Docket No. 01-00193

Dear Mr. Waddell:

Please find enclosed the original and thirteen copies of the testimony of Tim Kagele filed on behalf of Time Warner Telecom of the Mid-South, L.P. in the above-captioned proceeding. I have provided copies to all counsel of record.

Very truly yours,

**FARRIS, MATHEWS, BRANAN,
BOBANGO & HELLEN, P.L.C.**



Charles B. Welch, Jr.

CBW:lw

Enclosures

cc: Carolyn Marek

BEFORE
THE TENNESSEE REGULATORY AUTHORITY

IN RE:)	
DOCKET TO ESTABLISH GENERIC)	
PERFORMANCE MEASUREMENTS,)	Docket No. 01-00193
BENCHMARKS AND ENFORCEMENT)	
MECHANISMS FOR BELL SOUTH)	
TELECOMMUNICATIONS, INC)	

TESTIMONY OF TIM KAGELE
ON BEHALF OF
TIME WARNER TELECOM OF THE MID-SOUTH, L.P.

1. Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.

A. My name is Tim Kagele, Vice President Carrier Relations & Interconnect Operations for Time Warner Telecom. My business address is 10475 Park Meadows Drive, Littleton, Colorado, 80124.

2. Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to request that the Tennessee Regulatory Authority (TRA) incorporate equivalent high capacity Special Access services ordered from BellSouth Telecommunications, Inc.'s (BST) state and/or federal tariffs into Docket No. 00-00193, subjecting Special Access services to performance measurements, benchmarks and enforcement mechanisms. My testimony is filed on behalf of Time Warner Telecom of the Mid-South, L.P. (hereinafter "TWTC"). Additionally, TWTC requests the aforementioned Special

Access services be subjected to an approved Authority ordered remedy plan as part of this same proceeding.

3. Q. WHAT DO YOU MEAN BY SPECIAL ACCESS SERVICES?

A. Special Access services are services that are purchased out of an ILEC's federal or state tariff. For example, BST offers high capacity circuits, such as a DS1 and DS3 service, in its state and federal tariffs. These services are functionally equivalent to the unbundled network elements ("UNEs") and resold high capacity services that BST offers via its interconnection agreements or Resale tariffs. Special Access DS1 and DS3 services , UNE DS1 and DS3 and/or resale DS1 and DS3 services offer a combination of functionally equivalent, dedicated transport and loop network elements used to deliver a mixture of intrastate and interstate traffic to CLEC end user customers.

4. Q. WHY ARE SPECIAL ACCESS SERVICES IMPORTANT TO THE DEVELOPMENT OF COMPETITION?

A. Timely provisioning of Special Access services is critical to the development of robust local competition. These services provide end users with high capacity bandwidth and are designed for and utilized by BST's competitors to serve large and medium size business customers. Since BST's competitors often lack the ubiquitous network reach of BST, they must utilize a combination of their own network assets augmented by a high capacity circuit from BST to complete the link to the customer. Competitors rely upon the Special Access services, then, to complete the service to their end users instead of duplicating BST's existing network. Therefore, the use of high capacity circuits directly supports intrastate service competition.

BST remains the dominant provider of Special Access Service in Tennessee. BST is the only economically viable option for providing last mile facility to competitors' end user customers. Therefore, CLECs are just as dependent on the timely and proper provisioning by BST of Special Access services as are CLECs that purchase equivalent high capacity services on an unbundled or resale basis.

BST has different ordering arrangements that competitors must use depending on whether the high capacity circuits are ordered out of a tariff or an interconnection agreement. The processes and procedures associated with ordering Special Access have been used for many years and is well developed, but the processes for ordering unbundled or resold services are still new and competitors experience delays in provisioning. Hence, many CLECs utilize the special access ordering Access Service Request (ASR) ordering process to avoid the pitfalls of UNEs, and pay a premium over the prices paid for equivalent unbundled services.

Delays in provisioning are particularly harmful in this market segment. Large business customers are not tolerant of any unanticipated delays or problems in obtaining service. If a CLEC promises a customer service on a certain date and the date is not met because of BST's problems, the CLEC's reputation suffers irreparable harm. Receiving quality service from the ILEC, whether the CLEC orders that service out of a tariff or an interconnection agreement, is essential to the development of robust competition.

5. Q. WHY ARE BST'S CURRENT SPECIAL ACCESS REPORTING METRICS INSUFFICIENT TO ENCOURAGE ROBUST COMPETITION?

A. Currently, BST makes available only a handful of reporting metrics across a limited number of OSS reporting categories that capture its performance of Special Access services. To illustrate, for Special Access services, BST currently provides approximately six reporting metrics in three basic OSS reporting categories (ordering, provisioning and maintenance) while reporting numerous metrics in six OSS categories (ordering, provisioning, maintenance, billing, administrative and additional measures) for unbundled and resale services. However, TWTC has identified nineteen reporting metrics that are critical to be measured across six OSS categories (ordering, provisioning, maintenance, billing, administrative and additional measures) for Special Access services. See Exhibit A – Proposed Special Access Business Rules.

Currently, BST's Special Access reporting metrics are significantly lacking. Essential reporting of hold time performance in the ordering and maintenance centers, PF status, and billing dispute resolution is completely ignored in the current Special Access reporting metrics.

Today, any CLEC that wishes to receive Special Access reporting data for its own company may request it from BST. The data reported by BST is limited, failing to capture the critical measures that are designed to demonstrate that BST is providing quality services. TWTC believes that BST's available Special Access reporting metrics are insufficient to support a "level" playing field and to ensure robust competition when CLECs choose this mode of market entry.

6. Q. WHY ARE CLECS THAT USE SPECIAL ACCESS SERVICES PLACED AT A COMPETITIVE DISADVANTAGE?

- A. CLECs that use Special Access services are placed at a competitive disadvantage relative to CLECs that purchase equivalent high capacity services on a resold or unbundled basis. CLECs that purchase high capacity services on a resold or unbundled basis will have more performance data, metrics and benchmarks to measure whether they are receiving quality service, and if BST's performance is below the standards, those CLECs will have remedies and penalties to compensate them for that poor service. Therefore, BST will be incented to ensure that it complies with the metrics for resold and unbundled high capacity services, but will not have that same incentive for the equivalent services purchased by CLECs utilizing BST's tariff-based Special Access services. CLECs should not be penalized based upon their mode of entry.

TWTC has made substantial investment in plant and equipment to enable delivery of a high quality and reliable product to their end user customers. To exclude Special Access high capacity services from performance reporting requirements and a Commission ordered remedy plan effectively penalizes CLECs because of their business decision to purchase high capacity services out of a tariff instead of purchasing UNEs.

7. **Q. ARE THERE OTHER REASONS THAT THESE FUNCTIONALLY EQUIVALENT SERVICES SHOULD HAVE THE SAME PERFORMANCE METRICS AND ASSOCIATED PENALTIES APPLIED TO THEM?**

- A. Yes. The services offered are functionally equivalent, whether offered under a tariff or under an interconnection agreement. Any distinction between the Special Access services and UNEs is premised entirely on BST's unilateral regulatory decision whether to offer a particular service through its state or federal tariff or pursuant to an interconnection agreement. Without imposing metrics on the

equivalent Special Access services, BST could simply avoid metrics and remedies by assigning a particular service to the most favorable regulatory classification.

Second, BST has not identified any actual differences between equivalent high capacity Special Access facilities, unbundled facilities, and resold facilities that would justify different treatment. Exclusion of high capacity Special Access services that are used to deliver mixed traffic (intrastate and interstate) amounts to disparate treatment of CLECs choosing this mode of market entry where no apparent distinction is made for equivalent unbundled or resale services.

Moreover, inclusion of Special Access services ordered from tariffs appears to be an overlooked area of local market competition that requires immediate attention by the TRA to protect against backsliding by BST. Other state commissions, such as Minnesota and New York, have taken steps to ensure that local competition develops by beginning to review need for service standards for Special Access services. For example, due to the large number of systemic problems CLECs in the state of New York have experienced with Verizon's delivery of tariff based Special Services, CLECs have asked the New York Commission to open an investigation into Verizon's performance in this area¹. Although the New York proceeding is just getting under way, there appears to be substantial support for regulation of tariff based Special Access service in a fashion that is consistent with regulation of the incumbent provider's wholesale services. This Commission should include a similar review as part of this proceeding.

¹ NY PSC Case 00-C-2051 – *Proceeding to Investigate Methods to Improve and Maintain High Quality Special Services Performance* by Verizon New York, Inc.; and NY PSC Case 92-C-0665 – *Proceeding on Motion of the Commission to Investigate Performance Based Incentive Regulatory Plans for New York Telephone Company*.

8. Q. **HOW COULD EQUIVALENT SPECIAL ACCESS HIGH CAPACITY SERVICE BE EASILY INCORPORATED INTO PERFORMANCE MEASUREMENTS AND A REMEDY PLAN?**

A. Using the same framework for Special Access services as is used for unbundled and resold services would result in a single measurement and enforcement process being utilized to measure performance for all high capacity circuits, whether ordered as Special Access, unbundled, or resold products. Tariff based Special Access services can simply be disaggregated and reported monthly by BST along with all the other equivalent high capacity unbundled or resale services. In this way, all “wholesale” services will be measured and reported. This could be important in the future if structural separation is ordered as all wholesale services would have to be identified in that process. Including Special Access would also allow direct comparison between BST’s Special Access performance and its performance on other services like resale, interconnection trunks, and unbundled services. The TRA, as well as CLECs, would have all of the data necessary to ensure non-discriminatory treatment. The use of a process worked out by all parties over several months would be far more efficient than establishing and monitoring an entirely separate regime just for Special Access.

9. Q. **DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes.

EXHIBIT A

Proposed Special Access Business Rules

Title: SA-1		
Provisioning On Time Performance - Met Commitments		
Definition:		
This metric measures the Percent of Orders completed as verified by TWTC on or before the first confirmed customer desired due date, or a subsequent TWTC initiated and verified change in the order due date.		
Exclusions:		
<ul style="list-style-type: none"> • BST Test Orders • Disconnect Orders • BST Administrative orders • Record Orders • Orders that are not complete. (Orders are included in the month that they are completed) • Customer Not Ready (CNR), No Access (NA) and Lost Access (LA) only if verified by the customer. 		
Performance Standard:		
Greater Than or Equal to 96.0% within confirmed customer desired due date.		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	The percent of orders completed on or before the BST committed (FOC) due date. Each circuit is counted as a separate order, even if multiple circuits are ordered at the same time. A requested change in order due date is communicated by a supplemental issue of the ASR ("SUPP").	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Number of Orders where the Order completion date is on or before the customer desired due date.	Number of orders completed for product group.

Title:		
Average Delay Days On Missed Installation Orders (SA 2)		
Definition:		
This metric measures the average delay days for BST caused missed order due dates.		
Exclusions:		
<ul style="list-style-type: none"> • BST Test Orders • Disconnect Orders • BST Administrative orders • Record Orders • Orders that are not complete. (Orders are included in the month that they are completed) • Customer Not Ready (CNR), No Access (NA) and Lost Access (LA) only if verified by the customer. • Saturdays, Sundays, and Legal Holidays are not counted as Delay Days. 		
Performance Standard:		
Less Than or Equal to 3.0 delay days.		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	Measures the average number of days between the first FOC due date (or a subsequent customer initiated due date that was verified by the customer) and the actual work completion date as verified by the customer. Each circuit is counted as a separate order, even if multiple circuits are ordered at the same time. A requested change in order due date is communicated by a supplemental issue of the ASR ("SUPP").	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Sum of the completion date minus due date for orders missed due to BST reasons.	Number of orders missed for BST reasons.

Title:		
Installation Quality (SA 3)		
Definition:		
This metric measures the percent of new TWTC circuits installed by BST where a reported trouble was found in the network within 30 days of order completion. Includes Test OK and found OK trouble disposition codes.		
Exclusions:		
<ul style="list-style-type: none"> • Troubles closed due to customer action. • Troubles reported by BST employees in the course of performing preventative maintenance, where no customer has reported a trouble. • Customer Premises Equipment (CPE) troubles verified by the customer 		
Performance Standard:		
Less than or equal to 1.0 trouble reports within 30 days per 100 circuits installed during the calendar month by product type (1% or less).		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	Includes trouble reports received on the same day, or the day following BST completion of TWTC's order within 30 calendar days of order completion. Data is captured by product type.	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Number of trouble reports on circuits installed within 30 days of trouble report.	Total circuits installed in calendar month.

Title:		
Order Confirmation Timeliness (SA 4)		
Definition:		
This metric measures the percentage of BST Firm Order Confirmations (FOC), that include facility checks and delivery of a Design Layout Record (DLR), within the specified timeframes.		
Exclusions:		
<ul style="list-style-type: none"> • BST Test Orders. • Weekend and holiday hours (other than flow-through): • Weekend hours (5:00 PM Friday to 8:00 AM Monday). • Holiday hours (5:00 PM of the business day preceding the holiday to 8:00 AM of the first business day following the holiday). 		
Performance Standard:		
Firm Order Confirmation:		
<ul style="list-style-type: none"> • Electronically submitted or Manually submitted Orders with facility check: 95% within 48 hours. 		
Design Layout Record:		
<ul style="list-style-type: none"> • 5 business days regardless of Order method. 		
Report Dimensions		
Report By:		Geography:
<ul style="list-style-type: none"> • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Intra LATA Services: Current regional levels of disaggregation
		Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	The amount of elapsed time in business days between BST receipt of a clean Access Service Request (ASR) and distribution of a Firm Order Confirmation (FOC), with facility check, to TWTC. Measures percentage on-time FOCs returned to TWTC, and subsequent BST delivery of DLR within 5 business days completed between the measured dates. Note: The received date is restarted for rejected orders, and for each SUPP to change address, connecting facility assignment (CFA), or anything that materially affects the design of the circuit.	
SA 4 - 01	% On Time FOC – Facility Check (Electronically or Manually submitted)	
Products	Special Access Services: <ul style="list-style-type: none"> • DSO • DS1 • DS3 • OCx 	
Calculation	Numerator	Denominator
	Number of electronic or manual ASRs confirmed with a facilities check, sent where confirmation date and time minus submission date and time is less than standard for specified product.	Total number of electronic or manual ASRs due for confirmation with a facility check.
SA 4-02	% On Time Design Layout Record (DLR)	
Products	Special Access Services: <ul style="list-style-type: none"> • Same as FOC products 	
Calculation	Numerator	Denominator
	Number of DLRs completed on or before 5 days.	Number of DLRs due in month.

Title:		
Percent Missed Customer Desired Due Dates (CDDD) Due to a Lack of Facilities (SA 5)		
Definition:		
This metric measures the percent of missed CDDD's due to BST placing the order in Pending Facility (PF) status.		
Exclusions:		
<ul style="list-style-type: none"> • BST Test Orders • Disconnect Orders • BST Administrative orders • Record Orders • Orders that are not complete. (Orders are included in the month that they are completed) 		
Performance Standard:		
TBD		
Report Dimensions		
Report By:		Geography: State
<ul style="list-style-type: none"> • TWTC Specific 		
Metric Calculation Specifics		
Business Rule	The Percent of total monthly Orders that are placed in PF status as a result of no BST facilities. An order that receives a jeopardy code associated with PF status that results in a missed CDDD.	
Products	Retail Specials: <ul style="list-style-type: none"> • • 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx (included in DS3 measure)
Calculation	Numerator	Denominator
	Number of FOC'd or dispatched orders placed in PF status due to lack of BST facilities that result in a missed CDDD.	Number of FOC'd or dispatched orders completed for the product group.

Title:		
Trouble Duration Intervals (SA 6)		
Definition:		
This metric measures trouble duration intervals. Mean Time to Repair: (MTTR) measures the average duration time from trouble receipt to trouble clearance. It includes Test-OK and Found-OK. Measured on a running clock basis, but excludes customer validated no access time.		
Exclusions:		
<ul style="list-style-type: none"> • Subsequent reports (additional customer calls while the trouble is pending) • Customer Premises Equipment (CPE) troubles • Troubles closed due to customer action. • Troubles reported by BST employees in the course of performing preventative maintenance, where no customer reported a trouble. 		
Performance Standard:		
For DSO and DS1 products, MTTR is: <ul style="list-style-type: none"> • Not to exceed 3 hours. For DS3 and OCx, MTTR is: <ul style="list-style-type: none"> • Not to exceed 1 hour. 		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	The restoral interval for resolution of TWTC requested maintenance and repair is the elapsed time, measured in hours and tenths of hours, measured from TWTC's submission of a customer trouble to BST, regardless of the ultimate resolution of the trouble, to the time BST confirms trouble resolution with TWTC. The elapsed time is accumulated by service type and trouble disposition code for the reporting period. The accumulated time is divided by the count of maintenance tickets reported as resolved by BST (by service type and trouble type) during the period.	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Sum of trouble clear date and time minus trouble receipt date and time for product group	Number of trouble reports for product group.

Title:		
Reject/Query Timeliness (SA 7)		
Definition:		
Reject/Query Timeliness measures the time from BST receipt of TWTC ASR to the return of a reject/order clarification.		
Exclusions:		
<ul style="list-style-type: none">• BST Test Orders• Duplicate Rejects/Queries – Rejects/Queries issued against a unique PON (PON + Version Number + Carrier Id), identical and subsequent to the first reject/query.• Weekend and holiday hours (other than flow-through):• Weekend hours (5:00 PM Friday to 8:00 AM Monday).• Holiday hours (5:00 PM of the business day preceding the holiday to 8:00 AM of the first business day following the holiday).		
Performance Standard:		
Electronically or Manually Submitted Orders: 95% within 24 hours.		
Report Dimensions		
Report By: <ul style="list-style-type: none">• CLEC or Carrier Aggregate• TWTC Specific• BSE Affiliate Aggregate		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	The amount of elapsed time (in hours and minutes) between receipt of an ASR and distribution of an ASR reject/query.	
Products	Special Access: <ul style="list-style-type: none">• DS0• DS1• DS3• OCx	
Calculation	Numerator	Denominator
	Number of electronic or faxed rejects/queries sent where reject date and time minus the submission date and time is within the standard for the specified product.	Total number of ASRs electronically or faxed submitted rejected/queried for a specified product.

Title:		
Completed within Specified Interval (SA 8)		
Definition:		
For Specials orders, the percent of orders completed in specified number (by metric) of business days as specified, between application and work completion dates. The application date is the date (day zero (0)) that a valid service request (ASR) is received. If TWTC order is faxed, application date is business next day.		
Exclusions:		
<ul style="list-style-type: none"> • BST Test Orders. • Disconnect Orders. • Orders where customers request a due date that is beyond the standard published product installation interval. • BST Administrative orders. • Orders with invalid intervals (Negative Intervals or intervals over 200 business days – indicative of typographical error). • Orders that are not complete. (Orders are included in the month that they are complete). • Orders completed late due to any verified end user or TWTC caused delay. 		
Performance Standard:		
DS0 = 6 days, DS1 = 9 days, DS3 = 20 days, OCx = to be determined.		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	The percentage of orders completed within the specified interval is determined by first counting, for each reporting dimension, both the total numbers of orders completed within the reporting interval and the number of orders completed (within each sub-metric category) within the published or specified order interval.	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Sub-Metrics		
SA 8 - DS0	% Completed in six (6) Days (one (1) to –twenty-four (24) circuits – Voice Grade & Digital Data)	
Calculation	Numerator	Denominator
	Count of Specials orders with one (1) to five (24) circuits where completion date less application date is six (6) or fewer days.	Count of Specials orders with one (1) to five (24) circuits

SA 8 - DS1	% Completed in nine (9) Days (one (1) to –eight (8) Systems – DS1)	
Calculation	Numerator	Denominator
	Count of Special orders with one (1) to eight (8) systems where completion date less application date is nine (9) or fewer days.	Count of Special orders with one (1) to eight (8) systems.
SA 8 - DS3	% Completed in twenty (20) Days (one (1) to –four (4) Systems – DS3)	
Calculation	Numerator	Denominator
	Count of Special orders with one (1) to four (4) systems where completion date less application date is twenty (20) or fewer days.	Count of Special orders with one (1) to four (4) systems.

Title:		
Open Orders in Pending Facility (PF) Status (SA 9)		
Definition:		
This metric measures the average time to resolve the number of open orders that are held in PF status at the close of the reporting period.		
An open order is a valid order that has not been completed and has been placed in PF status. Open orders in PF status include:		
<ol style="list-style-type: none"> open orders that have passed the original CDDD due to BST placing the order in PF status reasons; and open orders that have not been assigned a completion date due to BST placing the order in PF status reasons. 		
Exclusions:		
<ul style="list-style-type: none"> BST Test Orders. Disconnect Orders. BST Administrative Orders. Orders that are complete or cancelled before the due date. Orders that have passed the committed completion date, or whose completion has been delayed, due to TWTC or end user delay. Orders that at the request of TWTC or BST Retail customer have not been assigned a completion date. 		
Performance Standard:		
TBD		
Report Dimensions		
Report By:		Geography: State
<ul style="list-style-type: none"> TWTC Specific 		
Metric Calculation Specifics		
Business Rule	Measurement of the average resolution interval for open PF status orders that have missed their original CDDD unless a subsequent change of due date is requested and verified by TWTC (via SUPP to the ASR for TWTC). Measurement of the average resolution interval for open PF status orders that have not been assigned a completion date due to BST reasons will commence with the PF status application date (PF status application date = Day 0).	
Products	Retail Specials: <ul style="list-style-type: none"> 	Special Access: <ul style="list-style-type: none"> DS0 DS1 DS3 OCx (Included with DS3 measurement)
Calculation	Numerator	Denominator
	Sum of PF status completion dates, minus the open PF status order application date in the reporting period.	Total number of PF status orders in the reporting period.

Title:		
% Jeopardies (SA 10)		
Definition:		
This metric measures the percentage of orders with missed due dates that receive jeopardy notices on or before the order due date.		
Exclusions:		
<ul style="list-style-type: none"> • BST Test Orders • Disconnect Orders. • BST Administrative orders. • Orders that are not complete or cancelled. 		
Performance Standard:		
Jeopardy Status Notification: BST should provide notice of a missed committed due date and a reason for the miss as soon as it has knowledge that the due date will be missed. For 100% of missed committed due dates, notice, a reason for the missed date, and an expected completion date received as soon as BST has knowledge that the due date will be missed, but no later than close of business on due date.		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate Breakdown by Reason Code: <ul style="list-style-type: none"> • No Exclusions 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	Percent jeopardies is the percentage of total orders processed for which BST notifies TWTC that the work will not be completed as committed in the original FOC. The measurement result is derived by dividing the count of jeopardy notices that BST issues to TWTC, by the count of FOCs returned by BST during the identical reporting period.	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Number of missed committed due dates where notice received on or before the due date.	Number of missed committed due dates.

Title:		
Customer Trouble Report Rate (SA 11)		
Definition:		
This metric measures the total initial customer direct or referred troubles reported, where the trouble disposition was found to be in the network or a trouble condition was not found (Found OK and Test OK), per 100 circuits in service.		
Subsequent Reports: Additional customer trouble calls while an existing trouble report is pending – typically for status or to change or update information, will be permitted but will not be counted against the initial trouble report.		
Exclusions:		
<ul style="list-style-type: none"> • Troubles reported on BST official (administrative) lines. • Troubles closed due to customer action. • Troubles reported by BST employees in the course of performing preventative maintenance, where no customer has reported a trouble • Customer Premises Equipment (CPE) troubles • Subsequent trouble reports while the initial trouble report is pending. 		
Performance Standard:		
Not greater than 1.0 trouble reports per 100 circuits (1% CTRR).		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	TWTC and BST repair reports are entered into and tracked via BST WFA (work force administration). Repair reports are downloaded nightly into BST TMS (trouble management system). Reports are counted in the month they post to BST TMS.	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Number of all trouble reports with found network troubles or not-found troubles.	Number of circuits in service.

Title:		
Repeat Trouble Reports (SA 12)		
Definition:		
<p>This metric measures the percent of troubles cleared that have an additional trouble reported/cleared within 30 days for which a network trouble is found. A repeat trouble report is defined as a trouble on the same circuit as a previous trouble report that occurred within the last 30 calendar days of the previous trouble. Any trouble, regardless of the original Disposition Code, that repeats will be classified as a repeat report.</p> <p>The identification of a repeat report and the scoring (number of days since original report) is based on the Close Date of the original report (often referred to as the "OR") to the Close Date of the repeater.</p>		
Exclusions:		
<ul style="list-style-type: none"> • Troubles reported by BST employees in the course of performing preventative maintenance, where no customer has reported a trouble. • Excluded from the repeat reports are: subsequent reports (additional customer calls while the trouble is pending). • Customer Premises Equipment (CPE) troubles when verified by the customer. • Troubles reported but not found (Found OK and Test OK). • Troubles closed due to customer actions. 		
Performance Standard:		
<ul style="list-style-type: none"> • Not to exceed 3.5% by product type. 		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	Includes customer trouble reports (by product type) received within 30 calendar days of an original customer report. When the second report is received in 30 days, the original report is marked as an original of a repeat report, and the second report is marked as a repeat. If a third report is received within 30 days, the second report is marked as an original of a repeat report as well as being a repeat, and the third report is marked as a repeat. In this instance, there would be 2 repeat reports.	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Number of troubles by product type that had previous troubles closed within the last 30 days.	Number of troubles by product type reported within the calendar month.

Title:		
OSS Interface Availability (SA 13)		
Definition:		
This metric measures the percent of time OSS interface is available compared to scheduled availability.		
Exclusions:		
<ul style="list-style-type: none"> Hours of BST pre-scheduled interface downtime. TWTC interface equipment problems. 		
Performance Standard:		
<ul style="list-style-type: none"> 99.5% interface availability during scheduled hours. 		
Report Dimensions		
Report By:		Geography:
<ul style="list-style-type: none"> BST Retail (If analog applies) TWTC Specific BSE Affiliate Aggregate CLEC or Carrier Aggregate 		<ul style="list-style-type: none"> Statewide
Metric Calculation Specifics		
Business Rule	The total "number of hours functionality to be available" is the cumulative number of hours (by date and time on a 24 hour clock) over which BST plans to offer and support TWTC access to EDI and/or NDM. "Hours functionality is available" is the actual number of hours, during scheduled available time, that BST interface is capable of accepting or receiving TWTC transactions or data files for processing.	
Products	Retail Specials: <ul style="list-style-type: none"> By interface type 	Special Access: <ul style="list-style-type: none"> By interface type (i.e. EDI and/or NDM) for ASRs and CABS
Calculation	Numerator	Denominator
	Number of Scheduled Interface Available Hours, minus the Number of Unscheduled Interface Unavailable Hours	Scheduled Interface Available Hours, times 100.

Title:		
Average Completion Interval (SA 14)		
Definition:		
This metric measures the average business days from receipt of a valid, error-free ASR to the completion date in BST service order system for new, move, or change orders.		
Exclusions:		
<ul style="list-style-type: none"> • Customer requested due dates beyond interval offered. • Orders delayed for customer reasons. • Customer premises equipment (CPE) troubles when verified by the customer. • BST Test Orders. 		
Performance Standard:		
<ul style="list-style-type: none"> • Diagnostic 		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: To be determined. Exchange Access Services: To be determined.
Metric Calculation Specifics		
Business Rule	The clock starts on the date a valid ASR is received and stops on the date that BST returns completion notice to TWTC. Orders are included in the month they are completed.	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Total business days from receipt of valid, error-free service request to completion date in BST service order system for new, move, or change orders.	Total new, move, or change orders within the calendar month.

Title:		
Missed Repair Commitments (SA 15)		
Definition:		
This metric measures the percentage of trouble reports not cleared by the commitment time due to BST reasons. The commitment time is defined in hours. A repair commitment shall be deemed missed when the clear date and time (in hours) exceeds the BST commitment to repair the trouble. Reports are counted the month they are closed.		
Exclusions:		
<ul style="list-style-type: none"> • Troubles reported by BST employees in the course of performing preventative maintenance, where no customer has reported a trouble. • Excluded from the missed repair commitments are: subsequent reports (additional customer calls while the trouble is pending). • Customer Premises Equipment (CPE) troubles when verified by the customer. • Troubles reported but not found (Found OK and Test OK). • Troubles closed due to customer actions. 		
Performance Standard:		
<ul style="list-style-type: none"> • 95% or better within the committed repair time. 		
Report Dimensions		
Report By: <ul style="list-style-type: none"> • BST Retail • CLEC or Carrier Aggregate • TWTC Specific • BSE Affiliate Aggregate 		Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation
Metric Calculation Specifics		
Business Rule	The commitment time is defined in hours. If the cleared date and time minus the receive date and time is greater than the committed repair time, it counts as a trouble report that missed the repair commitment. Reports are counted in the month they are closed.	
Products	Retail Specials: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx 	Special Access: <ul style="list-style-type: none"> • DS0 • DS1 • DS3 • OCx
Calculation	Numerator	Denominator
	Number of trouble reports not cleared by the commitment time for BST reasons.	Total trouble reports reported within the calendar month, times 100.

Title:		
Out of Service > 24 Hours (SA 16)		
Definition:		
This metric measures the percent of troubles cleared in excess of 24 hours for troubles reporting Out of Service (OOS) which includes no dial tone, cannot be called, or cannot call out. The clock begins when the original trouble report is created in the BST trouble management system and the trouble is counted if the time exceeds 24 hours.		
Exclusions:		
<ul style="list-style-type: none">• Trouble reports with OOS duration of less than 24 hours.• Troubles reported by BST employees in the course of performing preventative maintenance, where no customer has reported a trouble.• Excluded from the OOS reports are: subsequent reports (additional customer calls while the trouble is pending).• Customer Premises Equipment (CPE) troubles when verified by the customer.• TWTC equipment problems.• Troubles reported but not found (Found OK and Test OK).• Troubles closed due to customer actions.		
Performance Standard:		
<ul style="list-style-type: none">• 1% or less of reported circuit troubles each month out of service greater than 24 hours.		
Report Dimensions		
Report By: <ul style="list-style-type: none">• BST Retail• CLEC or Carrier Aggregate• TWTC Specific• BSE Affiliate Aggregate	Geography: Intra LATA Services: Current regional levels of disaggregation Exchange Access Services: Current regional levels of disaggregation	
Metric Calculation Specifics		
Business Rule	The close date and time minus the receive date and time must be greater than 0 and less than 24 hours for it to count as a trouble report that was cleared in less than 24 hours.	
Products	Retail Specials: <ul style="list-style-type: none">• DS0• DS1• DS3• OCx	Special Access: <ul style="list-style-type: none">• DS0• DS1• DS3• OCx
Calculation	Numerator	Denominator
	Number of circuit troubles reported each month that are not corrected within 24 hours.	Total number of circuit troubles reported within the calendar month, times 100.

Title:		
Speed of Telephone Answering (SA 17)		
Definition:		
This metric measures the average time it takes to reach a live "agent" for the aggregate of telephone calls placed to a BST work center each month.		
Exclusions:		
<ul style="list-style-type: none"> None. 		
Performance Standard:		
<ul style="list-style-type: none"> Not to exceed a 3 minute average for each BST work center per month. 		
Report Dimensions		
Report By:	Geography: Statewide	
<ul style="list-style-type: none"> BST Retail CLEC or Carrier Aggregate BSE Affiliate Aggregate 	<ul style="list-style-type: none"> ACAC (Access Carrier Account Center) LISC (Local Interconnection Service Center) 	
Metric Calculation Specifics		
Business Rule	Measured by individual ACD queue, if applicable, including ACD or warm transfer time to a live "agent" in each BST work center.	
Products		
Calculation	Numerator	Denominator
	Sum of the date and time for live "agent" call answer, minus date and time of call receipt.	Total calls answered by work center within the calendar month.

Title:		
Timeliness of Dispute Resolution (SA 18)		
Definition:		
This metric measures the length of time to resolve a billing dispute formally presented to BellSouth using the BAR process.		
Exclusions:		
<ul style="list-style-type: none"> Disputes submitted or initiated to BellSouth outside of the BAR process. 		
Performance Standard:		
<ul style="list-style-type: none"> 90% resolved within 30 calendar days 100% resolved within 45 calendar days If BellSouth does not resolve after 60 calendar days, the dispute is automatically resolved in initiator's favor. 		
Report Dimensions		
Report By: <ul style="list-style-type: none"> CLEC or Carrier Aggregate TWTC Specific BSE Affiliate Aggregate 		Billing System Interface Type: CABS <ul style="list-style-type: none"> Monthly recurring. Monthly non-recurring. Monthly fractional Adjustments Late Payment Charges Taxes/surcharges
Metric Calculation Specifics		
Business Rule	Initiator of dispute is responsible for providing a contact to confirm resolution of dispute. Automatic dispute resolution after 60 days is contingent upon BellSouth acknowledged 90% dispute accuracy rate of initiator for previous three reporting periods starting the date the dispute becomes sixty days old. On the 90 th day, BellSouth would be required to credit the amount of the dispute back to the date of initiation. A Reporting Period is defined as 30 calendar days. Disputes on all billed rate elements and types of charges, including recurring, fractional, non-recurring, late payment, and tax, are included.	
Products		Special Access: <ul style="list-style-type: none"> DS0 DS1 DS3 Ocx Collocation SS7 E911
Calculation	Numerator	Denominator
	Number of disputes resolved by BellSouth during a reporting period.	Total number of disputes submitted within a reporting period.

Title:		
Invoice Accuracy (SA 19)		
Definition:		
This metric measures the percentage of the total bill amount that is not adjusted by correcting service orders or adjustments for the month.		
Exclusions:		
<ul style="list-style-type: none"> Excludes late charges resulting from mandated billing changes. 		
Performance Standard:		
<ul style="list-style-type: none"> 95% accurate special services bills. 		
Report Dimensions		
Report By:		Billing System Interface Type: CABS
<ul style="list-style-type: none"> BST Retail (if analog applies) CLEC or Carrier Aggregate TWTC Specific BSE Affiliate Aggregate 		<ul style="list-style-type: none"> Monthly recurring. Monthly non-recurring. Usage Element.
Metric Calculation Specifics		
Business Rule	To ensure that all monthly bills sent to TWTC are rated accurately according to the billing tables. This is performed by extracting recurring, non-recurring, & usage elements from the CABS billing system and comparing the billed elements to expected results. For all validations performed, the number of elements that have been released prior to correction are counted as an error against the total elements audited.	
Products	Retail Specials: <ul style="list-style-type: none"> DS0 DS1 DS3 OCx 	Special Access: <ul style="list-style-type: none"> DS0 DS1 DS3 OCx
Calculation	Numerator	Denominator
	Total monies billed without corrections in the reporting period.	Total monies billed in the reporting period, times 100.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by placing same in U.S. Mail, postage prepaid, this the 16th day of July, 2001, upon the following:

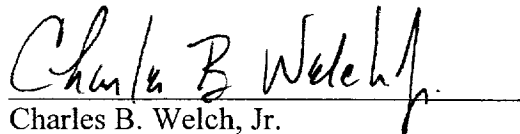
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